

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

MAY - 8 2019

David J. Bradley, Clerk

United States of America

- 1) Jose De Jesus SIMÓN Saldana YOB: 1999, MX
 2) Jose Abraham GARCIA Saucedo YOB: 1978, MX

Case No. 19-1041-MDefendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 7, 2019 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:


<i>Code Section</i>	<i>Offense Description</i>
21 USC 841	did knowingly and intentionally possess with the intent to distribute approximately 41.96 kilograms of methamphetamine
21 U.S.C. 846	conspiracy to possess with the intent to distribute approximately 41.96 kilograms of methamphetamine

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

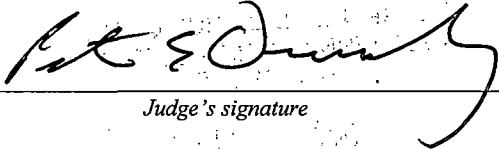
✓ Continued on the attached sheet.

Approved AUSA Steven Belt
 St Belt 3/8/19


 Complainant's signature

Antonio Perez IV, HSI McAllen Special Agent
 Printed name and title

Sworn to before me and signed in my presence.

Date: 5/8/20199:03 am

 Judge's signature
City and state: McAllen, Texas

U.S. Magistrate Judge Peter Ormsby
 Printed name and title

On May 7, 2019, U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) in McAllen, Texas received a duty call from the U.S. Customs and Border Protection, Office of Fields Operations (CBP/OFO) at the Hidalgo, Texas Port of Entry (POE). CBP informed HSI that they encountered Jose De Jesus SIMON Saldana when he arrived at the Hidalgo POE to apply for admission into the United States. SIMON was driving a gray Nissan Juke, displaying Mexico license plate FLJ1521.

During an inspection of SIMON's vehicle, CBP located a non-factory compartment under the floorboard area of SIMON's vehicle. CBP subsequently discovered approximately 41.96 kilograms of methamphetamine concealed in the compartment of SIMON's vehicle.

On May 7, 2019, HSI Special Agent (SA) A. Perez and SA I. Martinez arrived at the Hidalgo, Texas POE and conducted an interview with SIMON, the driver of the Nissan Juke. HSI SA A. Perez read SIMON his Miranda rights as witnessed by I. Martinez. SIMON stated he understood his rights and voluntarily waived them in writing. SIMON made the following non-verbatim statements that have been paraphrased and may not be in the order in which he gave them:

SIMON was aware that he was transporting narcotics from Mexico into the United States but claimed he did not know the type or quantity of the narcotics. SIMON stated he was delivering the narcotics to Dallas, Texas. SIMON stated he was provided \$400.00 to cover travel expenses to Dallas, Texas.

After the interview, HSI McAllen conducted a controlled delivery of SIMON's vehicle with the narcotics still inside the vehicle in an attempt to identify other members of the drug trafficking organization. HSI McAllen delivered the vehicle to a convenience store located in McAllen, Texas. HSI McAllen maintained surveillance on the vehicle and observed an individual, later identified as Jose Abraham GARCIA Saucedo, approach the vehicle. HSI McAllen subsequently arrested GARCIA.

After the arrest, HSI SA A. Perez read GARCIA his Miranda rights as witnessed by I. Martinez. GARCIA stated he understood his rights and voluntarily waived them in writing. GARCIA made the following non-verbatim statements that have been paraphrased and may not be in the order in which he gave them:

GARCIA stated on May 7, 2019, he was contacted by a relative that requested he travel to McAllen to conduct repairs on the Nissan Juke. GARCIA stated he traveled to McAllen with the intention of changing the battery of the vehicle. GARCIA stated that prior to traveling to McAllen he was informed that the vehicle contained packages and needed to be sent up. GARCIA claimed he did not know what the packages contained but was aware they were illegal.